

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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MAY 28 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
Administration of the North)
American Numbering Plan;) CC Docket No. 92-237
Carrier Identification Codes) DA 96-678

REPLY COMMENTS

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Sprint Corporation ("Sprint") on behalf of Sprint Communications Company, L.P. and the Sprint local operating companies hereby replies to the Comments filed by various parties to the Commission's Public Notice seeking to refresh the record on the above referenced docket¹ on the issue of the appropriate length of the transition period. The tentative conclusion from the Notice of Proposed Rulemaking was that the transition or permissive dialing period would last six years for the expansion during which both three and four digit Carrier Identification Codes ("CICs") would be recognized. The commenting parties recommended transition periods from six months² to twelve years³, with the majority supporting a one-to-two year time frame.⁴

Sprint agrees with other parties recommending a permissive dialing period of less than six years. With the enactment of the Telecommunications Act of 1996⁵,

¹Administration of the North American Numbering Plan, Notice of Proposed Rulemaking, 9 FCC Rcd 2068 (1994).

²NYNEX Comments, page 4.

³Telco Communications Group, Inc. Comments, page 6.

⁴CBT (Comments, page 1), Pacific Telesis (Comments, page 6), and Bell Atlantic (Comments, page 1) recommend one year. NYNEX (Comments, page 4) recommends six months or no later than April 1, 1997. SWB (Comments, page 1) and GTE (Comments, page 3) recommend no later than 12-31-96. US West (Comments, page 5) recommends no later than 1-1-97. And BellSouth (Comments, page 2) recommends no later than 12-31-97.

⁵Telecommunications Act of 1996, Pub.L. 104-104, 110 Stat 56 (1996).

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and the resulting increase in competitive activities, a long permissive dialing period is not necessary or conducive to the encouragement of competition. New entrants currently are being assigned four digit CICs. Their end users are experiencing the inconvenience of additional digits relative to existing carriers' end users. To support the competitive marketplace, Sprint proposes shortening the permissive dialing period from six years to three years, to terminate on March 31, 1998.

In addition to supporting the competitive marketplace, the transition period needs to be sufficiently long to allow end users and existing carriers to make necessary changes to update their systems. In contrast, new entrants will not have to make technological changes that are as significant as existing carriers. End users, such as PBX users or payphone providers, or even manufacturers, for example, may need to update or modify auto dialers or other equipment to accommodate additional digits. A six month period is not sufficient to allow end users to complete this process. Programming of existing equipment may suffice or it may be necessary to purchase new equipment or software which can adequately accommodate the new requirements.⁶ An end user may also perceive additional dialing as an inconvenience and may appreciate a permissive dialing period that

⁶AT&T (Comments, page 6 and footnote 11) suggests, that some end users will not have necessary equipment in place until well past the proposed six year transition period. However, as they indicate, "unless there is extensive customer education about the need for CPE upgrades to accommodate CIC expansion" it will not occur. Sprint proposes that three years is adequate time to extensively educate customers and to allow them to have CPE in place that will work with expanded CICs.

allows for this adjustment. But Sprint does not support a long transition period as this will only contribute to customer complaints and confusion.⁷

For carriers with three-digit CICs, the permissive dialing period must allow for upgrades or modifications to existing systems and sites to allow for the new CICs. Three years should be sufficient to budget for and to make all necessary upgrades to systems, including those needed by smaller network providers.⁸ Educating consumers of impending changes and their effects can be accomplished by existing carriers through direct mail and bill inserts within this three year transition period.⁹

⁷VarTec Telecom, Inc. (Comments, page 1) argues the opposite. But today's telecommunications customers are becoming used to technologically changes and will appreciate consistency, whatever it is.

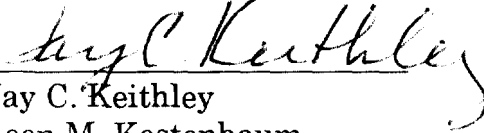
⁸BellSouth (Comments, page 2) also supports allowing additional time for smaller network providers and PBX owners to get necessary software installed.

⁹VarTec Telecom Inc. (Comments, page 1-2) argues it will take years to educate consumers. Sprint's experience has indicated that with appropriate notice, customers can and do make transitions fairly easily. US West (Comments, page 9) considers many consumers as "seasoned veterans of numbering changes", and includes the example of exhaustion of area codes or Numbering Plan Area ("NPA") codes.

Sprint supports the concept of a multi-year permissive dialing period of no more than a three year period to terminate on March 31, 1998.

Respectfully submitted,

SPRINT CORPORATION

By 

Jay C. Keithley
Leon M. Kestenbaum
1850 M Street N.W.
Suite 1100
Washington, DC 20036-5807
(202) 857-1030

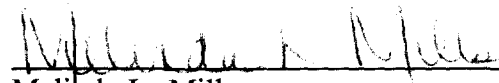
Diane R. Stafford
P. O. Box 11315
Kansas City, MO 64112
(913) 624-2429

Its Attorneys

May 28, 1996.

CERTIFICATE OF SERVICE

I, Melinda L. Mills, hereby certify that I have on this 28th day of May, 1996, sent via U.S. First Class Mail, postage prepaid, or Hand Delivery, a copy of the foregoing "Reply Comments of Sprint Corporation" in the Matter of Administration of the North American Numbering Plan; Carrier Identification Codes, CC Docket No. 92-237, DA 96-678, filed this date with the Acting Secretary, Federal Communications Commission, to the persons on the attached service list.


Melinda L. Mills

Judy Sello
AT&T
295 N. Maple Avenue
Room 3244J1
Basking Ridge, NJ 07920

John Goodman
Bell Atlantic
1133 20th Street, NW
Washington, DC 20036

Coleen M. Egan Helmreich
US West
1020 19th Street, NW
Room 700
Washington, DC 20036

David Gudino
GTE
1850 M Street, NW
Suite 1200
Washington, DC 20036

Julia Waysdorf
Swidler & Berlin, Chartered
3000 K Street, NW
Washington, DC 20007
Counsel for Telco Communications Group

Loretta Garcia
Donald J. Elando
MCI
1801 Pennsylvania Avenue, NW
Washington, DC 20006

Marlin D. Ard
Nancy C. Woolf
Pacific Telesis
140 New Montgomery Avenue
Room 1523
San Francisco, CA 94105

Margaret Garber
Pacific Telesis
1275 Pennsylvania Avenue
Washington, DC 20004

M. Robert Sutherland
BellSouth
1155 Peachtree, NE
Suite 1700
Atlanta, GA 30309-3610

James D. Ellis
Robert M. Lynch
David F. Brown
SBC Communications, Inc.
Room 1254
175 E. Houston
San Antonio, TX 78206

Durward Dupree
J. Paul Walters
Southwestern Bell Telephone Co
One Bell Center
Room 3520
St. Louis, MO 63101

Michael G. Hoffman
VarTec Telecom
3200 W. Pleasant Run Road
Lancaster, TX 75146

Joel Ader*
Bellcore
2101 L Street, NW
Suite 600
Washington, DC 20037

Regina Keeney*
Chief, Common Carrier Bureau
Federal Communications Commission
1919 M Street, NW
Room 500
Washington, DC 20554

Jim Schlichting*
Chief, Competitive Pricing Div.
Federal Communications Commission
1919 M Street, NW
Room 518
Washington, DC 20554

Wilbur Thomas*
ITS
1919 M Street, NW
Room 246
Washington, DC 20554

Thomas E. Taylor
Christopher J. Wilson
Cincinnati Bell
2500 PNC Center
201 East Fifth Street
Cincinnati, OH 45202

Campbell L. Ayling
NYNEX
1111 Westchester Avenue
White Plains, NY 10604

* Indicates Hand Delivery